

1 MEGAN K. DORSEY, ESQ.  
2 Nevada Bar No. 6959  
3 IAN P. GILLAN, ESQ.  
4 Nevada Bar No. 9034  
5 KOELLER NEBEKER CARLSON & HALUCK, LLP  
6 300 South Fourth Street, Suite 500  
7 Las Vegas, NV 89101  
8 Phone: (702) 853-5500  
9 Fax: (702) 853-5599  
10 Attorneys for Defendants,  
11 SAFECO INSURANCE COMPANY OF ILLINOIS,  
12 SAFECO INSURANCE COMPANY OF AMERICA  
13 and LIBERTY MUTUAL GROUP, INC.

14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MIGUEL FRANCO, ) CASE NO. 2:11-cv-00269-RLH -GWF  
vs. )  
Plaintiffs, ) **STIPULATION AND ORDER TO**  
vs. ) **DISMISS SAFECO INSURANCE**  
SAFECO INSURANCE COMPANY OF ) **COMPANY OF AMERICA AND**  
ILLINIOS; SAFECO INSURANCE ) **LIBERTY MUTUAL GROUP, INC.,**  
COMPANY OF AMERICA; LIBERTY ) **WITHOUT PREJUDICE**  
MUTUAL GROUP, INC., )  
Defendants. )

---

IT IS HERBY STIPULATED BY AND BETWEEN, Defendants, SAFECO  
INSURANCE COMPANY OF ILLINOIS, SAFECO INSURANCE COMPANY OF  
AMERICA and LIBERTY MUTUAL GROUP, INC., by and through their counsel of record,  
Ian P. Gillan, Esq., of KOELLER, NEBEKER, CARLSON & HALUCK, LLP and MIGUEL  
FRANCO, by and through his counsel of record, Craig M. Murphy, Esq. of MURPHY &  
MURPHY LAW OFFICES, as follows:

1           SAFECO INSURANCE COMPANY OF AMERICA and LIBERTY MUTUAL  
2 GROUN, INC., are hereby dismissed, without prejudice, from the above entitled action "*Miguel*  
3 *Franco v. Safeco Insurance Company of Illinois, Safeco Insurance Company of America and*  
4 *Liberty Mutual Group, Inc.*, Case No. A-11-633521-C, originally filed in the Eighth Judicial  
5 District Court for the State of Nevada in and for the County of Clark and duly removed to this  
6 Court, each party to bear its own fees and costs in regards to the dismissal of these two parties.  
7

8 DATED this 24<sup>th</sup> day of February, 2011.

8 DATED this 24<sup>th</sup> day of February, 2011.

9 MURPHY & MURPHY LAW OFFICES

9 KOELLER, NEBEKER, CARLSON  
10 & HALUCK, LLP

11 By: /s/ Craig M. Murphy  
12 CRAIG M. MURPHY, ESQ.  
13 Nevada Bar No. 4014  
14 10191 Park Run Drive, Ste. 100  
15 Las Vegas, NV 89145  
16 Attorneys for Plaintiff,  
17 MIGUEL FRANCO

11 By: /s/ Ian P. Gillan  
12 IAN P. GILLAN, ESQ.  
13 Nevada Bar No. 9034  
14 300 South Fourth Street, Suite 500  
15 Las Vegas, NV 89101  
16 Attorneys for Defendants,  
17 SAFECO INSURANCE COMPANY OF  
18 ILLINOIS, SAFECO INSURANCE  
19 COMPANY OF AMERICA and  
20 LIBERTY MUTUAL GROUP, INC.

21  
22  
23  
24  
25  
26  
27  
28

## ORDER

Based on the foregoing Stipulation,

IT IS HEREBY ORDERED that SAFECO INSURANCE COMPANY OF AMERICA and LIBERTY MUTAL GROUP, INC. are dismissed without prejudice.

## **IT IS SO ORDERED.**

DATED this 25th day of February, 2011.

UNITED STATES DISTRICT

JUDGE

Respectfully Submitted By:

KOELLER NEBEKER CARLSON  
& HALUCK, LLP

By: /s/ Ian P. Gillan  
MEGAN K. DORSEY, ESQ.  
Nevada Bar No. 6959  
IAN P. GILLAN, ESQ.  
Nevada Bar No. 9034  
300 South Fourth Street, Suite 500  
Las Vegas, NV 89101  
Attorneys for Defendants,  
SAFECO INSURANCE COMPANY OF  
ILLINOIS, SAFECO INSURANCE  
COMPANY OF AMERICA and  
LIBERTY MUTUAL GROUP, INC.